



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking on the Commission's Own  
Motion into the Service Quality Standards for All  
Telecommunications Carriers and Revisions to General  
Order 133-B

Rulemaking 02-12-004  
(Filed December 5, 2002)

**REPLY COMMENTS OF CTIA – THE WIRELESS ASSOCIATION®  
ON SCOPING MEMO ISSUES**

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In accordance with the schedule set forth in the March 30, 2007 Scoping Memo, as modified by the April 12, 2007, ruling of Assigned Administrative Law Judge Grau, CTIA-The Wireless Association® (“CTIA”) replies to May 14, 2007 submissions of the Division of Ratepayer Advocates (“DRA”) and The Utility Reform Network (“TURN”) in the above captioned rulemaking.

**I. INTRODUCTION**

The Commission's approach to the issue of service quality regulation should be forward looking - one which builds on the current competitive state of the telecommunications industry, not one which uses the former monopoly regime as its starting point. While the majority of the stakeholders in this proceeding used their opening submissions to comment on the competitive nature of the industry and how such competition has lent itself toward improved service quality for consumers, there were a few which would ignore those advances and have the Commission impose stringent service quality metrics on all providers. This latter group, namely TURN and DRA, have approached this proceeding from an out-dated perspective – *i.e.*, service quality metrics are necessary to assure a minimum level of service for consumers. While such a perspective may have had some merit under the monopoly telecommunications regime it makes

no sense for the wireless industry, which was established and has thrived under a competitive regime. The following excerpt from J.D. Power & Associates illustrates the extreme competitive environment under which wireless carriers operate and how that environment has impacted service quality:

Wireless providers have clearly made great strides in improving call quality ... With an increasingly competitive environment and an increase in the number of services used in conjunction with a cell phone, carriers that offer superior network quality are more likely to attract new customers and increase customer retention. In fact, improving network quality is a beneficial financial incentive for wireless carriers, as customers experiencing at least one call quality problem are almost four times more likely to definitely switch carriers in the future.<sup>1</sup>

CTIA submits that the Commission should maintain the goal for service quality regulation stated in the Scoping Memo in this proceeding –“rely on competition, wherever possible, to promote broad consumer interests.” In the case of the wireless industry, the carriers continue their efforts to enhance the network (efforts which are limited more by local zoning issues and resource limitations than any other factor) and to provide consumers with useful and easily comprehensible information in readily available formats. There is no basis for the Commission to take action.

## **II. THE PROVISION OF GRANULAR LEVEL COVERAGE MAPS, AS REQUESTED BY DRA, WILL DO NOTHING TO ADVANCE CARRIER SERVICE QUALITY**

DRA recommends “that the Commission require wireless service providers to post on their Internet sites and make available in their stores coverage maps of the same granularity and

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<sup>1</sup> J.D. Power Associates, March 15, 2007 Press Release “*Wireless Call Quality Problems Continue to Decline as the Transition to 3G Networks Takes Hold.*” In its latest study (released March 2007), J.D. Power found that the percentage of wireless calls with at least one problem has declined by 14 percent since the last two reporting periods (March-April and June-July 2006).

accuracy as used by their engineers.”<sup>2</sup> According to DRA, “no carrier or reseller makes available signal strength and coverage data of sufficient detail to allow consumers to make meaningful purchase decisions based on the quality of the wireless providers’ signal coverage.”<sup>3</sup> DRA argues that the provision of detailed coverage maps is necessary under the mandates of Public Utilities Code Section 2896 which requires telephone corporations to provide customers “sufficient information upon which to make informed choices among telecommunications services and providers.”<sup>4</sup> Thus, the underlying premise of DRA’s position appears to be that, absent the provision of detailed coverage maps to consumers, the consumer has no means of ascertaining whether a wireless carrier provides adequate service in the geographic locations where the customer will use his phone. DRA is incorrect.<sup>5</sup>

First, evidence which has already been entered into the record of this proceeding illustrates that it would in essence be misleading to provide a consumer with coverage maps under the premise that such maps would allow them to determine, with certainty, whether their wireless calls would go through in the geographic locations of import to him.<sup>6</sup> DRA is correct that, as a general matter, wireless carriers develop detailed signal contour maps that provide a specific indication of the signal strength observed at a snapshot in time. These maps may even show the contours of expected “in building,” “in vehicle” and “open air” RF signal strengths.

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<sup>2</sup> Comments of the Division of Ratepayer Advocates re Inclusion on Wireless Coverage Maps as Part of the Commission’s Rulemaking 02-12-004,” R. 02-12-004 (May 14, 2007) (“DRA Coverage Map Comments,” at p. 3.

<sup>3</sup> *Id.*, at p. 8.

<sup>4</sup> *Id.*, at p. 2.

<sup>5</sup> It should be noted that, contrary to DRA’ assertions, certain major wireless carriers do provide consumers with detailed coverage maps which provide consumers with current information on the predicted level of service coverage at designated locations.

<sup>6</sup> See Declaration of Leonard Cascioli, Vice President, RF Engineering, Nextel Communications, A. 02-12-004, (May 5, 2003) (“Cascioli Declaration”) at p. 4.

Moreover they may be at a “street-by-street or block-by-block” level. Nevertheless, these more granular maps *do not* provide any assurance that a particular call at a particular time and location will “go through.” Such maps are not used for that purpose by the wireless carrier engineers and technicians who develop them. Rather their purpose is to assist the carrier in tuning and retuning the “cellular” radios that comprise the carrier’s network.<sup>7</sup>

The fact is that there are numerous reasons that can impact radio frequency signal strength on a wireless network. These factors are neither predictable nor controllable by a wireless carrier.<sup>8</sup> Because these factors can create “holes” in a wireless carrier’s “coverage” that are capable of changing from moment to moment, hour to hour, day to day and season to season, there is no means by which a “coverage” map can be made to depict, with certainty, a customer’s ability to make or receive a wireless call at a given location.<sup>9</sup>

Second, wireless consumers are provided with a tool for determining whether a wireless carrier’s coverage meets their individual needs – the trial service period – which is more valuable, and customer specific, than a detailed coverage map. Each consumer of wireless service is provided a trial period in which to test that service. During the trial period, a customer can terminate the service without an early termination fee if he or she finds the service does not meet their needs. Stated another way, during the trial period, the customer can use the phone in the manner and in the places in which he desires service (e.g., at home, office, driving certain routes, etc) and determine whether the service is adequate for his needs. Such personalized information is much more valuable than a detailed coverage map (no matter how granular), as

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<sup>7</sup> *Id.*

<sup>8</sup> Such factors include weather, man-made structure that may change over time, materials buildings are constructed of.

<sup>9</sup> Cascioli Declaration, at pp. 4-5.

the map will not be able to capture every nuance particular to each individual customer (e.g., whether the individual will be able to receive coverage in a basement office; whether the individual will receive reception in a college dorm room; whether the individual will receive coverage in an often-frequented recreational area). What is important to the average customer is that the service be useful in the geographic locations he frequents. The trial period affords the customer the opportunity to obtain the information needed to make such determination.

### **III. COMMISSION BASED SERVICE QUALITY METRICS WITH A CORRESPONDING REPORT CARD ARE NOT NECESSARY, ARE POTENTIALLY HARMFUL TO THE MARKET AND COULD REDUCE OVERALL CUSTOMER SATISFACTION**

DRA proposes that the surveys being advanced in the URF proceeding should include questions regarding service quality for both wireline and wireless service. In conjunction with this proposal, DRA has recommended that the results be posted on the Commission's website in a "report card" type format that indicates which carrier has met the standard as determined by the Commission for each service quality metric.

In its opening comments, CTIA, as did a number of carriers, noted that a Commission sponsored service quality survey is neither necessary nor appropriate,<sup>10</sup> and, in fact, could be detrimental to the Commission's oft-stated goal of relying on competition to promote consumer interests. For example, a Commission-sponsored survey with posted results could inadvertently distort the competitive market by leading the consumer to believe that the Commission is somehow endorsing one carrier's service or products over another carrier's service or products.<sup>11</sup> Another inadvertent impact of a Commission-sponsored survey could be that providers begin to

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<sup>10</sup> See, e.g., Comment of CTIA-The Wireless Association on Scoping Memo Issues, R. 02-12-004 (May 14, 2007) ("CTIA Comments"), at pp. 2-3; Opening Comments of Verizon Wireless on Assigned Commissioner's Ruling and Scoping Memo; R. 02-12-004 (May 14, 2007) at pp. 5-6.

<sup>11</sup> CTIA Comments at pp. 2-3.

focus on improving the particular service attributes that the Commission’s survey identifies, at the expense of maximizing customers’ overall satisfaction.<sup>12</sup>

#### **A. Service Quality Surveys as Advanced by DRA are not Necessary**

In opening comments, multiple parties pointed out that there is no public policy purpose that a Commission-sponsored survey could achieve given the fact that the market already produces various high quality, publicly available sources of customer satisfaction data.<sup>13</sup> As TURN states, “one of the most important elements of giving consumers a choice of service providers is access to information, including facts about the relative quality of service offered by different competitors.”<sup>14</sup> CTIA does not disagree and notes that the marketplace is doing just that. Several established and respected organizations include wireless services among the various products and services for which they conduct customer satisfaction surveys<sup>15</sup>. These entities have significant expertise, experience, and resources to devote to this task. If the goal is to educate consumers, the market is doing just that.

#### **B. DRA’s Proposed Report Card Could Further Distort the Market While also Reducing Overall Customer Satisfaction**

The potential distortions to the competitive marketplace caused by a Commission sponsored service quality survey would only be compounded if the Commission were to adopt DRA’s proposed “report card” – i.e., publication on the Commission website stating whether

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<sup>12</sup> See Opening Comments of Verizon California Inc. and its Certificated California Affiliated on March 30, 2007 Assigned Commissioner Ruling and Scoping Memo, R. 02-12-004 (May 14, 2007), at p.15.

<sup>13</sup> See Declaration of Michael Fernandez Supporting the Opening Comment of the Verizon California Inc and its Certificated California Affiliates, R. 02-12-004, at p.3, Comments of Joint Comment Parties in Response to Assigned Commissioner’s Ruling Assigned Commissioner’s Ruling and Scoping Memo, R. 02-12-004, (May 14, 2007), pp. 3-4; CTIA Comments at pp. 3-7.

<sup>14</sup> Opening Comments of the Utility Reform Network on Scoping Memo Issues, R. 02-12-004 (May 14, 2007)(“TURN Comments”), at p. 5.

<sup>15</sup> See CTIA Comments at pp.3-7 (detailing market surveys on wireless carrier service quality).

each carrier passed or failed each service quality measure. In other words, if DRA's proposal was adopted, the Commission will be giving a stamp of approval to certain carriers while relegating others to failure status. Such a demarcation by a government agency could have a profound impact on the competitive market. As service quality data is readily available in the marketplace from a variety of sources, the perception could be created that the Commission was the definitive source. The Commission, giving a passing grade to one carrier, while "failing" another, could cause an unwarranted shift of demand in the marketplace. Given the Commission's conclusion in Decision 06-08-030 regarding the existence of widespread competition, and its determination to rely on competition wherever possible to promote broad consumer interest, it should reject a proposal such as DRA's report card, which could artificially skew the operation of competitive forces.

Moreover, another inadvertent impact of a Commission-sponsored survey could be that providers begin to focus on improving the particular service attributes that the Commission's survey identifies, at the expense of maximizing customers' overall satisfaction as determined by the competitive process.<sup>16</sup> If carriers are going to be graded on certain metrics with the results posted on the Commission's website, it stands to reason that carriers will divert resources to achieving superior grades in those metrics, shifting resources away from other aspects of the overall customer experience. Unlike regulators, carriers have constant interaction with the marketplace, and therefore are more able to determine the elements of service quality of most importance to the consumers that carrier serves or most valued relative to cost. DRA's report card will place *all* carriers in the position of having to expend resources to achieve a high level of

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<sup>16</sup> See Opening Comments of Verizon California Inc. and its Certificated California Affiliates on March 30, 2007 Assigned Commissioner Ruling and Scoping Memo, R. 02-12-004 (May 14, 2007), at p.15.



quality with respect to certain service metrics (irrespective of whether they are of importance to their customers) and as a result take away from each customer the very real option of choosing a service which meets his/her balance of quality and cost.<sup>17</sup>

#### **IV. TURN'S SERVICE METRIC PROPOSAL WILL NOT MEET ANY STATED PURPOSE**

TURN proposes performance data from concrete indicators be gathered by carriers on a monthly basis and be submitted quarterly to the Commission for publication on its website. With respect to wireless service, TURN proposes that the following service metrics be measured: (1) average wait time to speak to a live agent; (2) CPUC complaint data;<sup>18</sup> (3) percent of calls to customer service that receive a busy signal; (4) percent of calls to customer service which are abandoned; (5) call success rate; (6) service coverage; and (7) call drop out. With respect to several of these metrics, TURN attaches specific target goals which should be met by the carrier (e.g., call success rate of 95% and call drop out of less than 5 %). TURN (comments at 6) offers the following rationale for its proposal:

Consumers should have access to objective information that allows comparison across a number of elements, including quality. It is the antithesis of a free market that consumers should be forced to rely solely on marketing hype of

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<sup>17</sup> See Declaration of Dr. Debra J. Aron Supporting Opening Comments of Verizon California Inc. and its Certificated California Affiliates. R. 02-12-004 (May 14, 2007) at p. 11-12.

<sup>18</sup> It is not clear from TURN's comments whether it is suggesting that the metric of complaints per million customers address all complaints or just service quality complaints. Either way it does not represent a valid metric. As the Commission determined in D. 06-03-013, reporting raw complaint data does not give an adequate representation of the scope or degree of a problem:

There also is no indication that DRA validated that "complaining" consumers were reporting actual grievances. Currently our database cannot distinguish whether an inquiry registered in our database is regarding a new complaint, or simply following up on a matter that is one among many in our significant backlog of consumer complaints. Our database also does not provide any means of assessing whether there was any validity to a consumer's complaint. We could find some indication of the validity of the consumer's complaint in how a complaint is resolved, but currently our database is incapable of effectively recording what, if any, related resolution occurs. D.06-03-013, *mimeo* at p. 13.

various competitors, especially for an essential product such as communications service.

As illustrated below, TURN's justification for the imposition of service quality standards (and the posting of the results on the Commission's website) is faulty on several fronts.

First, TURN appears to be operating under the erroneous assumption that the only source of information which a consumer has about a carrier or its products/service is the carrier itself. As has been illustrated many time in this proceeding, the market has already responded to the consumers' desire for information in the form of independent third party service quality surveys by entities with significant expertise in the field. This information is widely available to the public and provides a reliable source of information about carriers. Moreover, as discussed above, this independent source of information is coupled with another valuable source of information – the trial period afforded each wireless consumer to test the service and determine whether it meets its needs. Thus, contrary to TURN's assertions, consumers are not left with “marketing hype” as the sole basis for deciding on a wireless service.

Second, TURN's proposal suggests metrics that do not recognize the reality of current business practices and which are otherwise of little or no value. For example, TURN proposes that the carriers report on the average wait time to speak to a live agent yet fail to recognize that carriers offer consumers a number of ways to obtain the information they need automatically either through an IVR, the website or their cell phone device itself.

Finally, TURN's proposal, that is premised on wireless carriers submitting their individual service quality measurements to the Commission,<sup>19</sup> will not meet TURN's stated intent of providing consumers' access “to objective information that allows comparisons across a

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<sup>19</sup> See TURN comments at p. 13.

number of elements, including quality.”<sup>20</sup> In order for a consumer to meaningfully compare service quality metrics across a number of carriers, each carrier would need to track/measure the metric in the same manner. Such is not the case. Each carrier has its own respective method(s) for tracking data such as dropped calls or signal strength which is dependent on, among other things, the systems utilized for tracking the data and the purpose for which the data is to be used. Accordingly, the data reported by each carrier will not be equivalent, and thus not allow for the across-the-board comparison contemplated by TURN.

## **V. DRA’S RECOMMENDATION FOR OUTAGE SUBMISSIONS IS NOT WARRANTED**

DRA (comments at pp. 17-18) references two service outage reports which are submitted by carriers to the Federal Communications Commission (“FCC”) and requests that comparable data be provided by carriers to the Commission and that at least some of that data be published on the Commission’s web site.<sup>21</sup> CTIA submits that the scope of DRA’s request is overreaching.

First, DRA notes that in compliance with the FCC’s Outage Reporting Order, carriers are required to report all “outages”<sup>22</sup> to the FCC that (1) last at least 30 minutes; and (2) which potentially affect at least 900,000 user–minutes. DRA recommends that all service providers be required to provide this information directly to the CPUC so as to “ensure that the commission receives this information without depending on whether the information is available from the FCC.” Because of the sensitive nature of the outage information, the FCC rules provide that this data is to be submitted on a confidential basis and that access to that data will be significantly

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<sup>20</sup> TURN comments at p. 6.

<sup>21</sup> DRA specifically requests that reports on outages effecting 10% or more of customer be published. DRA Comments at 18. It is unclear whether DRA is advocating that the other outage information also be published.

<sup>22</sup> Outage is defined as a significant degradation in the ability of an end user to establish and maintain a channel of communications as a result of failure or degradation in the performance of a communications provider's network. See 47 C.F.R. Section 4.5(a).

restricted.<sup>23</sup> The FCC was very explicit in its rationale for protecting the confidentiality of the outage information provided by carriers:

Given the competitive nature of many segments of the communications industry and the importance that outage information may have on the selection of a service provider or manufacturer, we conclude that there is a presumptive likelihood of substantial competitive harm from disclosure of information in outage reports. In addition, under FOIA Exemption 4 we are also obliged to consider any adverse impact that disclosure might have on government programs, including the impact on the Commission's ability to implement its statutory responsibility under section 1 of the Act to ensure that communications services are adequate to protect "the national defense" and promote "safety of life and property."<sup>24</sup> The record in this proceeding, including the comments of the Department of Homeland Security, demonstrate that the national defense and public safety goals that we seek to achieve by requiring these outage reports would be seriously undermined if we were to permit these reports to fall into the hands of terrorists who seek to cripple the nation's communications infrastructure. In addition, release of this information could also make regulated entities less forthright in the information submitted to the Commission at a time when it is especially critical that we obtain full and accurate information in order to prevent harm to the communications infrastructure.<sup>25</sup>

However the FCC was receptive to request to make the information available to other governmental authorities and ultimately decided that that dissemination process would best be handled by the Department of Homeland Security (DHS).<sup>26</sup> DHS in turn was supportive of providing such information to state PUCs precisely because it would avoid the creation of state specific reporting requirements and preserve the security of the information:

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<sup>23</sup> See 47 C.F.R. Section 4.2.

<sup>25</sup> See In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications, FCC 04-188, ET Docket No. 04-35, Report and Order and Notice of Further Rulemaking (August 19, 2004), at ¶ 45.

<sup>26</sup> See *id.* at Para 47 "DHS requests that it receive outage information directly, so that the Secretary of the Department of Homeland Security and the Department's organizational units can fulfill their responsibilities under the Homeland Security Act. We will, therefore, make available to DHS, in encrypted form and immediately upon receipt, all electronically submitted outage reports. DHS can then undertake to provide information from those reports to such other governmental authorities as it may deem to be appropriate." [citations omitted]

DHS states that outage information should be made available to State Public Utilities Commissions, noting that such a provision would address “a key concern expressed by carriers relative to the costs and administrative burdens associated with potentially redundant reporting schemes across levels of government and among multiple States.” DHS Comments at 8. DHS further states that because much of the reported data “would likely constitute ‘homeland security information’ under Federal law, sharing the information with State authorities through such channels would also facilitate more effective safeguarding of this sensitive information against disclosure to those who might desire to use it for hostile purposes.” *Id.* See also *id* at nn. 16-17 (description of authority available to DHS to protect that information from inappropriate disclosure).

DRA’s failure to articulate why the Commission needs this information directly from the carriers (as opposed to going through DHS channels), coupled with the high level of confidentiality which the FCC believes should be afforded such data, must result in rejection of DRA’s proposal.

Second, DRA is recommending that all service providers provide a report comparable to the annual summary report that eligible telecommunications carriers (“ETC”) submit to the FCC on outages affecting 10% or more of customers. DRA states that “providing this report would be an advantage to service providers who are not already ETCs in that it would make it that much easier for them to qualify as ETCs to receive federal high cost fund, federal Lifeline/Linkup and other subsidy supports.” As far as CTIA knows, there is only one wireless provider in California which is an ETC. There is no “advantage” to wireless carriers to submitting the recommended report. There are numerous requirements that a wireless carrier must comply with to become an ETC, the FCC report is only one such requirement and is, therefore, unlikely to “tip” the scales in favor of more wireless carriers becoming an ETC in California. Moreover, for the reasons stated above, the posting of this summary data on a publicly available website would raise significant competitive concerns and pose homeland security risks. Accordingly this DRA proposal must also fail.

## V. CONCLUSION

CTIA submits that neither TURN nor DRA have supported their proposals regarding the impositions of certain service quality metrics and/or the conducting of customer service quality surveys. Robust competition has provided customers with benefits in many areas. Competition has already enhanced the information that customers are receiving from carriers about the products and services offered, and has lead to more robust networks. Given the absence of need for service quality regulation, coupled with the potential harm such regulation could impose on the competitive marketplace, the Commission should dismiss TURN's and DRA's proposals outright.

Respectfully submitted,

Dated: June 15, 2007

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**CERTIFICATE OF SERVICE**

I, Melinda LaJaunie, certify that I have on this 15<sup>th</sup> day of June 2007 caused a copy of the foregoing

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SCOPING MEMO ISSUES**

to be served on all known parties to R 02-12-004 via email to those listed with email on the most recent service list on the CPUC website.

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I declare on penalty of perjury under California law that the foregoing is true.  
Executed this 15<sup>th</sup> day of June 2007 at San Francisco, California.

/s/ Melinda LaJaunie  
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